UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

| UNITED STATES OF AMERICA, | |
|---------------------------|--|
| Plaintiff, | |
| vs. | |

ZACHARY GROSSER,

INDICTMENT

Defendant.

_____/

The Grand Jury charges:

COUNT 1

Engaging in the Business of Manufacturing and Dealing Firearms Without a License

Between approximately summer 2018 and August 18, 2021, in Kalamazoo County, in the Southern Division of the Western District of Michigan, the defendant,

ZACHARY GROSSER,

not being licensed to manufacture or deal firearms, willfully and knowingly engaged in the business of manufacturing and dealing firearms.

18 U.S.C. § 922(a)(1)(A) 18 U.S.C. § 924(a)(1)(D) 18 U.S.C. § 921(a)

COUNT 2

Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record

On or about August 18, 2021, in Kalamazoo County, in the Southern Division of the Western District of Michigan, the defendant,

ZACHARY GROSSER,

knowingly possessed a firearm, knowing it was a rifle having a barrel of less than 16 inches in length, namely, a privately-made 9mm rifle with a barrel of approximately 9 inches in length, purple in color, bearing no serial number, and that weapon was not registered to him in the National Firearms Registration and Transfer Record.

26 U.S.C. § 5861(d)

26 U.S.C. § 5841(a)

26 U.S.C. §§ 5845(a)(3), (c)

26 U.S.C. § 5871

COUNT 3

Possession of a Firearm Under the National Firearms Act Not Identified by a Serial Number

On or about August 18, 2021, in Kalamazoo County, in the Southern Division of the Western District of Michigan, the defendant,

ZACHARY GROSSER,

knowingly possessed a firearm, knowing it was a rifle having a barrel of less than 16 inches in length, namely, a privately-made 9mm rifle with a barrel of approximately 9inches in length, purple in color, and that weapon was not identified by a serial number.

26 U.S.C. § 5861(i)

26 U.S.C. § 5841(a)

26 U.S.C. §§ 5845(a)(3), (c)

26 U.S.C. § 5871

COUNT 4

Possession of a Firearm with a Removed, Obliterated, or Altered Serial Number

On or about August 18, 2021, in Kalamazoo County, in the Southern Division of the Western District of Michigan, the defendant,

ZACHARY GROSSER,

knowingly possessed a firearm with the importer's or manufacturer's serial number removed, obliterated, or altered; namely, a Ruger model Super Blackhawk .44 caliber revolver, and that firearm had been shipped or transported in interstate or foreign commerce.

18 U.S.C. § 922(k)

18 U.S.C. § 924(a)(1)(B)

18 U.S.C. § 921(a)

FORFEITURE ALLEGATION

(Count 1: Engaging in the Business of Manufacturing and Dealing Firearms without a License)

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c). Upon conviction of the offense in violation of 18 U.S.C. § 922(a)(1)(A) set forth in Count 1 of this Indictment, the defendant,

ZACHARY GROSSER,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved or used in the offense, including, but not limited to, the following:

- 1. Privately Made Firearm ("PMF") 9mm rifle with a barrel of approximately 9¼ inches in length, purple in color, without a serial number
- 2. PMF .45 caliber pistol (Rock Island Armory slide) without a serial number
- 3. PMF .45 caliber pistol, black with red in color, without a serial number
- 4. PMF Polymer 80 model PF940V2, 9mm, without a serial number
- 5. Palmetto State Armory Rifle, model PA-15, 7.62 caliber rifle, serial number SCD927268
- 6. Taurus, model 692, .357 revolver, serial number MT583374
- 7. Ruger, model Super Blackhawk, .44 caliber revolver, obliterated serial number
- 8. Browning, model Buck Mark, .22 caliber pistol, serial number 655NM14554
- 9. Ruger, model 10/22, .22 caliber rifle, serial number 359-48032
- 10. Savage, model 64, .22 caliber rifle, serial number L203691
- 11. Palmetto State Armory, model PA-15, AR receiver, serial number SCD927282
- 12. New England Firearms, model Pardner, .410 shotgun, serial number NF366282

18 U.S.C. § 924(d)(1) 28 U.S.C. § 2461(c) FORFEITURE ALLEGATION

(Count 2: Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

and

(Count 3: Possession of a Firearm Under the National Firearms Act

Not Identified by a Serial Number)

The allegations contained in Count 2 and Count 3 of this Indictment are hereby re-

alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to

26 U.S.C. § 5872(a) and 28 U.S.C. § 2461(c). Upon conviction of the offense in violation of

26 U.S.C. § 5861(d) set forth in Count 2 of this Indictment, or the offense in violation of 26

U.S.C. § 5861(i) set forth in Count 3 of this Indictment, the defendant,

ZACHARY GROSSER,

shall forfeit to the United States, pursuant to 26 U.S.C. § 5872(a) and 28 U.S.C. § 2461(c),

any firearms and ammunition involved in or used in the offense, including, but not

limited to, a privately-made 9mm rifle with a barrel of approximately 9 inches in length,

purple in color, bearing no serial number.

26 U.S.C. § 5872(a)

28 U.S.C. § 2461(c)

FORFEITURE ALLEGATION

(Count 4: Possession of a Firearm with a Removed,

Obliterated, or Altered Serial Number)

The allegations contained in Count 4 of this Indictment are hereby re-alleged and

incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C.

§ 924(d)(1) and 28 U.S.C. § 2461(c). Upon conviction of the offense in violation of 18 U.S.C.

§ 922(k) set forth in Count 4 of this Indictment, the defendant,

ZACHARY GROSSER,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c),

any firearms and ammunition involved in or used in the offense, including, but not

limited to, a Ruger model Super Blackhawk .44 caliber revolver with an obliterated serial

number.

18 U.S.C. § 924(d)(1)

28 U.S.C. § 2461(c)

A TRUE BILL

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GRAND JURY FOREPERSON